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A REGISTERED LIMITED LIABILITY PARTNERSHIP



February 10, 2025

The Hon. Robert M. Illman  
Eureka-McKinleyville Courthouse  
3140 Boeing Ave  
McKinleyville, CA 95519

RE: *In re: Motion to Compel*, No. 3:25-MC-80017-AMO (N.D. Cal.)  
*In re OpenAI ChatGPT Litig.*, No. 3:23-cv-3223-AMO (N.D. Cal.)

Dear Judge Illman:

Our firms represent the plaintiffs in *Authors Guild et al. v. OpenAI, Inc.*, No. No. 1:23-CV-08292-SHS (S.D.N.Y.) (*Authors Guild Action*), and in *In re: Motion to Compel*, No. 3:25-MC-80017-AMO (N.D. Cal.) ("Subpoena Action"). The Subpoena Action relates to the *Authors Guild* Plaintiffs motion to enforce subpoenas served on Dario Amodei and Ben Mann. The Plaintiffs in *In re: ChatGPT Litigation* Action have also moved to enforce subpoenas against Messrs. Amodei and Mann, an issue scheduled to be addressed in the *In re: ChatGPT Litigation* tomorrow at 11:00 a.m. *In re ChatGPT* Dkts. 248 (motion to quash), 257 (opposition), 273 (reply), & 302 (clerk's notice of hearing).

Counsel for the *Authors Guild* Plaintiffs will attend tomorrow's discovery hearing in *In re: ChatGPT* and will be prepared to answer any questions Your Honor may have about the *In re Motion to Compel* Action. Thank You.

Sincerely,

LIEFF CABRASER HEIMANN  
& BERNSTEIN LLP

SUSMAN GODFREY LLP

COWAN, DEBAETS,  
ABRAHAMS & SHEPPARD  
LLP

/s/ Rachel Geman  
Rachel Geman

/s/ Rohit Nath  
Rohit Nath

/s/ Scott J. Sholder  
Scott J. Sholder